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DEPARTMENT OF ENERGY
Federal Energy Regulatory Commission

LS Power Development, LLC
Doswell Limited Partnership

v.

Docket No. EL21-72-000

PJM Interconnection, L.L.C.

Notice of Complaint

Take notice that on May 7, 2021, pursuant to sections 206, and 306 of the Federal Power Act, 16 USC 824e, 825e and Rule 206 of the Federal Energy Regulatory Commission's (Commission) Rules of Practice and Procedure, 18 CFR 385.206, LS Power Development, LLC and Doswell Limited Partnership (Complainants) filed a formal complaint against PJM Interconnection, L.L.C., (Respondent or PJM) alleging that the Respondent violated the Reliability Assurance Agreement among Load Serving Entities in the PJM Region by approving FRR Alternative elections by entities whose FRR Capacity Plans did not demonstrate the commitment of capacity resources to meet their capacity obligations for the full term of the elections, all as more fully explained in the complaint.

The Complainant certifies that copies of the complaint were served on the contacts listed for Respondent in the Commission's list of Corporate Officials, and on the Independent Market Monitor for PJM.

Any person desiring to intervene or to protest this filing must file in accordance with Rules 211 and 214 of the Commission's Rules of Practice and Procedure (18 CFR 385.211, 385.214). Protests will be considered by the Commission in determining the appropriate action to be taken, but will not serve to make protestants parties to the proceeding. Any person wishing to become a party must file a notice of intervention or motion to intervene, as appropriate. The Respondent's answer and all interventions, or protests must be filed on or before the comment date. The Respondent's answer, motions to intervene, and protests must be served on the Complainants.

The Commission strongly encourages electronic filings of comments, protests and interventions in lieu of paper using the "eFiling" link at <http://www.ferc.gov>. Persons unable to file electronically may mail similar pleadings to the Federal Energy Regulatory Commission, 888 First Street, NE, Washington, DC 20426. Hand delivered submissions in docketed proceedings should be delivered to Health and Human Services, 12225 Wilkins Avenue, Rockville, Maryland 20852.

In addition to publishing the full text of this document in the Federal Register, the Commission provides all interested persons an opportunity to view and/or print the contents of this document via the internet through the Commission's Home Page (<http://www.ferc.gov>) using the "eLibrary" link. Enter the docket number excluding the last three digits in the docket number field to access the document. At this time, the Commission has suspended access to the Commission's Public Reference Room, due to the proclamation declaring a National Emergency concerning the Novel Coronavirus Disease (COVID-19), issued by the President on March 13, 2020. For assistance, contact the Federal Energy Regulatory Commission at FERCOnlineSupport@ferc.gov, or call toll-free, (886) 208-3676 or TYY, (202) 502-8659.

Comment Date: 5:00 pm Eastern Time on May 27, 2021.

Dated: May 13, 2021.

Kimberly D. Bose,
Secretary.

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